

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Debtor(s)**

CHAPTER 13

**Lakeview Loan Servicing, LLC
Movant
vs.**

NO. 17-01806 HWV

**Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Debtor(s)**

**Charles J. DeHart, III Esq.
Trustee**

11 U.S.C. Section 362

**DEBTORS' ANSWER TO MOTION OF
Lakeview Loan Servicing, LLC FOR RELIEF
FROM THE AUTOMATIC STAY UNDER
SECTION 362**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted in part; Denied in part. Debtors admit they are behind in their mortgage, however, they are exploring the option of taking out a hardship 401(k) loan, which would require a Motion to Incur Debt, to pay the arrears in full. Debtors will amend their Plan and roll in the arrears if they are unable to obtain the retirement loan. Debtors do not anticipate that the loan will affect their Plan payment.
9. No response required as this is a request for relief.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion for Relief from Stay and continue this matter for 45 days to give Debtors an opportunity to file a Motion to Incur Debt and/or amend their Plan to roll in the post-petition arrears.

Respectfully Submitted:
/s/Dawn Marie Cutaia
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